

ENFORCEMENT CONFIDENTIAL

MEMORANDUM

DATE: January 29, 1987 ⁹³

TO: DLPC File ^{AL}

FROM: Jeff Larson, L.A. Federal Site Project Manager

SUBJECT: Sauget Update
 L1630200005 -- St. Clair Co.
 Sauget Sites -- Sauget
 Superfund -- General Correspondence

SAUGET SITES UPDATE

OVERVIEW OF SAUGET SITES - PROJECTS

The Sauget/Dead Creek project area is located in the communities of Sauget and Cahokia, Illinois. This area has a long history of industrial pollution related problems. Presently, there are four studies being conducted in this area which have a direct bearing on the IEPA decisions and management. The following overview will update you to the present status of these studies and related activities.

I. SAUGET SITES - RI

Ecology and Environment is under contract with IEPA to perform on-site investigations, sampling analysis, and generate a Remedial Investigation. There are 18 separate sites included in the E&E RI Study. The project is being managed by Jeff Larson of the Federal Sites Management Unit. There are two objectives to this RI, (which is essentially an expanded PA/SI).

- . Generate detailed information of on-site conditions.
- . Compile information to be used for an HRS score enabling IEPA to nominate the Sauget sites as NPL projects to the USEPA and secure Federal funding.

A. PAST ACTIONS

The following brief history provides an overview of in-house and contracted tasks which have been accomplished.

1. Legal/Enforcement Action

- a. IEPA attorney Bruce Carlson, in conjunction with E&E, has compiled a detailed record composed of 150 plus landowners of the Sauget sites. Bruce contacted (with the help of Keri Luly, Community Relations) all landowners to secure Consent



of Entry Agreements. Many legal actions and persuasive discussions have taken place since January 1, 1986, against private individuals and large industries in order to secure the C.O.E.'s necessary to initiate the proposed field work. This effort took nearly 13 months to complete.

- b. Cerro Copper has informed IEPA that they will be conducting legal business with a new firm. (Refer to Bruce Carlson.)

2. Work Plan and Work Alterations

- a. IEPA accepted the final Work Plan from E&E in May of 1986. This plan included the Site Sampling Plan, Quality Assurance Project Plan, Health and Safety Plan, and Site Historic and Community Relations Plan.
- b. Ecology & Environment approached IEPA in June of 1986 through their President Gerhard Neumaier of Buffalo, N.Y. E&E was concerned that IEPA would not be able to achieve NPL status from the approved sampling plan with the present HRS System. E&E presented a proposed plan which eliminated and added tasks which would provide for a higher HRS. These changes in S.O.W. were reviewed and agreed to by IEPA in July. A contract amendment was prepared in August of 1986.
- c. Due to extremely high levels of contaminants being recovered from the sites, the E&E laboratory in Buffalo, N.Y. was having great difficulty performing the work outlined in the QAPP without violating the Quality Controls Protocol. A meeting between E&E's lab managers, quality control person (from Buffalo, NY), project manager, and IEPA's Quality Assurance Officer (Ron Turpin) and Project Manager Jeff Larson was held in Chicago in January 1987. After a detailed review of the problems encountered, QC protocol was altered (by permission of the IEPA QA officer and the Project Manager) in order to recover more precise data from the Dead Creek area.
- d. IEPA has stopped the FS and is using part of the FS funds for the HRS package. The FS is not a major factor in this project, better use of funds would occur if monies are applied to a expanded HRS package.
- e. IEPA should expect delays in preparation of New HRS model.

3. Community Relations

- a. In April, 1986 a meeting was held with Monsanto, their consultants Geraghty & Miller, IEPA (Jeff Larson & Keri Luly) and Ecology and Environment to negotiate a Consent of Entry Agreement and discuss sampling on Monsanto properties.



Both parties agreed to sharing information (Finalized Documents) and splitting samples. Geraghty & Miller also agreed to provide us with their studies in final form, due in April-May and received in November and December 1986.

- b. A public meeting was held in the Cahokia City Hall (September, 1986) to inform interested citizens of progress in the project.
- c. Keri Luly, Jeff Larson, and Bob Rosen toured the Sauget, Cahokia, Dead Creek sites on July 29, 1987. Bob will assist Keri in Community Relations activities.

4. Field Work

On-site field work was initiated in October of 1986. Ecology & Environmental performed and completed by March 1987 the following work:

- a. Electromagnetic Conductivity Surveys
- b. Seismic Refraction Survey
- c. Magnetometry Survey
- d. Soil Gas Testing
- e. Soil Sampling
- f. Monitoring Well Installation - (Canonie Engineering)
- g. Groundwater Sampling
- h. Air Monitoring - (completed July 24, 1987)
- i. Drum Staging (completed July 24, 1987)
- j. Drum Removal (October-1987)

5. IEPA Notification of USEPA Concerning Contaminant Levels

IEPA notified USEPA representatives in Chicago of the high levels of contaminants, (PCBs, PCPs, octochlorobenzene-dioxin) at Site G, adjacent to Dead Creek.

USEPA Fencing -- USEPA asked PRPs to fence Site G to prevent public access. Monsanto provided labor crews and funded the fence placement. Project was completed May 15, 1987. At the close of Air Monitoring USEPA will notify PRPs for a synthetic cap to be placed on-site. IEPA has notified USEPA to trigger their enforcement action.

B. PROPOSED ACTIONS

- 1. Development of Draft & Final RI -- This document was due September 11, 1987. At present 95% of laboratory data has been validated. E&E notified IEPA that the document would be completed by January 29, 1988. Many consultants and



USEPA are interested as to when the final version of this document will be completed.

2. Development of HRS Package -- The USEPA will not accept new packages after April of 1987. A new scoring system may be implemented starting in April 1988. IEPA should expect a 2 to 6 month delay due to protests from industries. USEPA presented the new HRS model to its staff on January 12th and 13th. The model will be published in February for public comment. It appears to be an expanded Endangerment Assessment - much more involved and costly than the old model. I notified E&E that I was and am concerned about time frames and costs. We are planning a meeting for February to discuss the RI and HRS.
3. Presentation Meeting -- Data was presented during a meeting at IEPA on September 29, 1987.
4. Attorney General v. Monsanto -- (Refer to "III-recent events" of this update.)
5. IEPA staff have been notified as to expected review time frame by memo of January 22, 1988.

II. Geraghty & Miller Groundwater Studies

The groundwater engineering firm of Geraghty & Miller (Plainview, New York) hired by Monsanto and the Association of Industries in Sauget has prepared a study showing the flow of groundwater movement in the area.

A. Monsanto Study

This study has been reviewed by an inter-divisional review team chaired by Jeff Larson. The review team felt that the amount of pollution in the groundwater and entering the Mississippi River is significant. In addition, OCS found documentation showing impact to aquatic biota due to the contamination of nitrochlorodibenzene into the river. The USEPA completed their review. A meeting was held in Chicago July 23, 1987, to formulate Agency position and final comments. Comments have been generated and sent to Warren Smull at Monsanto on July 31, 1987, with additional comments sent August 3. Comments to our comments were received September 16, 1987.

B. Association of Industries Study

The inter-divisional Review Team has completed its review of this document. This document professes the same principals as the previous Geraghty & Miller Study. The report details the existence of a large number of pollutants but concludes that they are quickly diluted and create no significant impact to the environment. USEPA has completed its review and a meeting was held July 23, 1987, to



review the document. Comments were generated and sent to Warren Smull (SSDRA) at Monsanto on August 3, 1987. A reply to our comments and the Dead Creek sites was received September 21, 1987.

III. Geraghty & Miller - Monsanto Krummrich Facility Drum Site - Route 3

The Monsanto Krummrich personnel discovered a buried drum site in late 1985. Monsanto hired Rollins Environmental Services to perform a removal operation in January of 1986. The project was halted in the early stages when excavation revealed the integrity of the drums had been destroyed by natural decomposition. Monsanto then hired G&M to develop and select remedial alternatives. Monsanto's selected remedy was a capping design. The IEPA/USEPA Review Team, concluded that Monsanto should select a final remedial alternative that would address the problem with a final solution. The report was obviously biased and quickly eliminated many applicable remedial technologies for no or little reason. A meeting was held with Monsanto and GM in Chicago May 11, 1987. Monsanto will continue capping plans but also develop a more detailed RI/FS. Plans and specifications for the Route 3 drum site were received by Bill Child on August 13, 1987. Responsive comments to IEPA/USEPA comments will be received at the end of the month. A review and reply to the Route 3 drum site cap detail was sent out the first week in September, 1987, (copy attached).

Recent Events

Monsanto submitted an HSP for the Rt. 3 site August 27, 1987. Construction on the site was initiated in September, 1987 with the cap. USEPA notified DLPC that an explosion had occurred at the Zimpro treatment facility on December 21, 1987. This explosion (unknown causes) will delay the expected proposal date to January 15th 1988.

Attorney General vs. Monsanto

In 1984 the A.G.'s office filed suit against Monsanto. This action was triggered by Monsanto allowing leachate seeps to occur from the Monsanto toxic site into the Mississippi River. This site is known as Site 'R' within the IEPA study being performed by Ecology & Environment.

Monsanto and the A.G.'s office met on October 8, 1987 to meet the new plant manager, William Boyle (replacing Jack Malloy) and view a presentation by Geraghty and Miller Groundwater Consultant (Plainview, New York) on the results of the Monsanto Groundwater Study. David Miller and Nick Valkenburg made the presentation to Howard Chinn, Nancy Mackiewicz, Patricia Morris, and Joe Madonia of the A.G.'s office.

Joe Madonia called William Child, LPC to explore setting up a meeting between our offices and review the status of the IEPA-RI and our



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technical opinions of the G&M Groundwater Study. A meeting was set for November 10, 1987 at IEPA. On November 6, 1987 Boyle and Pierle of Monsanto met with Bharat Mathur and Roger Kanerva to express their interest in developing a technical discussion pertaining to the Monsanto toxic site. Monsanto would like to have the flexibility to generate their own RI/FS from the Geraghty & Miller study and select a remedial alternative which allows for cleanup of the site.

On November 16, 1987 the IEPA/AG meeting was attended by the following parties:

Attorney General's Office

Howard Chinn - Chief Engineer, Environmental Control Division
Nancy Mackiewicz - Environmental Geologist
Patricia Morris - Assistant Attorney General

Land Pollution - IEPA

William Child - Division Manager
Bharat Mathur - Division Department Manager
Jim Frank - Manager Remedial Project Management Section
Terry Ayers - Manager Federal Site Management Unit
Jeff Larson - Project Manager Federal Site Management Unit
Monte Nienkerk - Manager State Remedial Action Priority List Section
Ken Mensing - Field Office Services (Collinsville, IL)

Enforcement IEPA

Bruce Carlson - Attorney

Community Relations

Bob Rosen - C.R. Office

Office of Chemical Safety

James O'Brien - Manager
Tom Hornshaw - Project Officer

It was evident from our discussions that an excellent foundation of cooperation between officers has been developed on this project. The A.G.'s office values interaction with IEPA on this site as well as any other sites in the Sauget area. The A.G.'s office has been supplied with USEPA personnel names and phone numbers (Dave Favero, Anne Weinert). The IEPA personnel voiced their dissatisfaction at the quality of the G&M study and details of their comments (sent to Warren Smull in July and August 1987). A strategy was developed on how to approach Monsanto concerning the toxic site on the scheduled November 17, 1987 meeting in St. Louis. It was decided that the A.G.'s office attend the meeting and schedule a follow-up with Monsanto to discuss the next step in our strategy. In the meantime Nancy Machiewicz and Jeff Larson will review Sauget information. The A.G.'s office will not make a



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decision as to a final remedial alternative for the site without consultation with IEPA. The AG's office and IEPA will meet again on February 4th, 1988.

IV. Anticipated Problems & Benefits

1. The HRS scoring for federal sites is being delayed by one year due to a change in the scoring model. This allows for a more thorough HRS model development for the site.
2. We have been talking with the U.S. Fish and Wildlife, Department of Interior, and FDA on their research on Mississippi River fish. (Refer to August 3 update.) They plan to resample the river after the Zimpro process at the treatment plant is on line. They will share samples with IEPA. Zimpro's deadline of October 30 has been extended to November 15, 1987. Extended again to December 30, 1987. Explosion caused another extension to January 15, 1988. Zimpro's proposal.
3. USEPA has hired Life Systems, Inc. to consolidate maps and materials involving Sauget sites into a more discernible format. On December 16th, 1987 Jack Laningan (Cleveland, Ohio) and Joe Madonia Illinois Attorney General's office plus personnel from the East St. Louis A.G.'s office toured the Sauget sites.
4. Craig Colten's Historical Assessment of Hazardous Waste Mgt. in Madison of St. Clair Counties (1890-1980) first draft has been distributed for review and comment. Due January 31, 1988 -- Ken Mensing, Keri Luly, A.G.'s office and USEPA have been supplied copies for comment.
5. Cerro Copper has hired the firm Avenet Group (Pam Gratton) 1906 Forest Drive, Annapolis, Maryland 21401 (301/261-1177) to develop a SOW for RI/FS on sites H, I, and not G.
6. Dave Favero has left USEPA to work for Black & Veatch in Kansas City, Missouri. He has been replaced by Ed Addison 5HE12, 312/886-4760.

JL/mls/sp2725g/1-7

cc: Bill Child
Bharat Mathur
Jim Frank
Terry Ayers
Monte Nienkerk
Keri Luly
Bob Rosen
Bruce Carlson
Bob Rosen
Ken Mensing
Tom Crause
Greg Dunn
Jim O'Brien